

**RADIO MARKET ANALYSIS**  
**CADILLAC BROADCASTING, LLC**  
**WKAD (FM) RADIO STATION**  
**HARRIETTA, MICHIGAN**  
**November 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cadillac Broadcasting, LLC ("Cadillac" ), proposed assignee of the construction permit of radio station WKAD, Channel 229A, Harrietta, Michigan.<sup>1</sup> Cadillac also has attributable interests in the licensees of stations WATT, 1240 kHz, and WLXV, Channel 244C3, Cadillac, Michigan.<sup>2</sup> The 3.16 mV/m contours of both the applied for and authorized WKAD overlap with WLXV. The 3.16 mV/m contours of the applied for WKAD and the licensed WLXV also overlap with the 5.0 mV/m contour of WATT.<sup>3</sup> This results in Cadillac having attributable interests in two FM facilities and one AM facility in the same market. Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The study is to determine the number of other commercial AM and FM stations that either have transmitter sites within the subject radio

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- 1) There is a modification of construction permit pending for WKAD, BMPH-20011024AAR. The WKAD CP and pending modification are shown on Exhibit #1 and both are considered in this instant analysis.
- 2) MGB also has attributable interests in the licenses of WLXT, Channel 242C1, Petoskey, Michigan, and WKHQ, Channel 290C1, Charlevoix, Michigan. The principal community contours of WLXT and WKHQ do not overlap with either WKAD or WLXV and are, therefore, not considered in this analysis.
- 3) Since the applied for WKAD overlaps with a higher number of stations, this market is reviewed for compliance, and is considered a worst case combination.

market, or have principal community contour overlap with any of the subject stations. The city grade contours of the subject stations define the Radio Market for the purposes of this analysis.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of nine commercial AM and FM stations, including the three subject stations. Exhibit #3 is a tabulation of the stations in the radio market. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>4</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible (provided the number of stations to be commonly held does not exceed fifty percent of the market). Cadillac's interests in the two FM stations and one AM station in the same radio market are in compliance with the Commission's rules. Therefore, Cadillac's proposed ownership of WKAD is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Cadillac Broadcasting, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the pertinent CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

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4) There are additional stations in the market, but they were not considered since the number of stations depicted was sufficient to demonstrate that the total of stations to be commonly held is in compliance with the Commission's rules.

Graham Brock, Inc. - Broadcast Technical Consultants

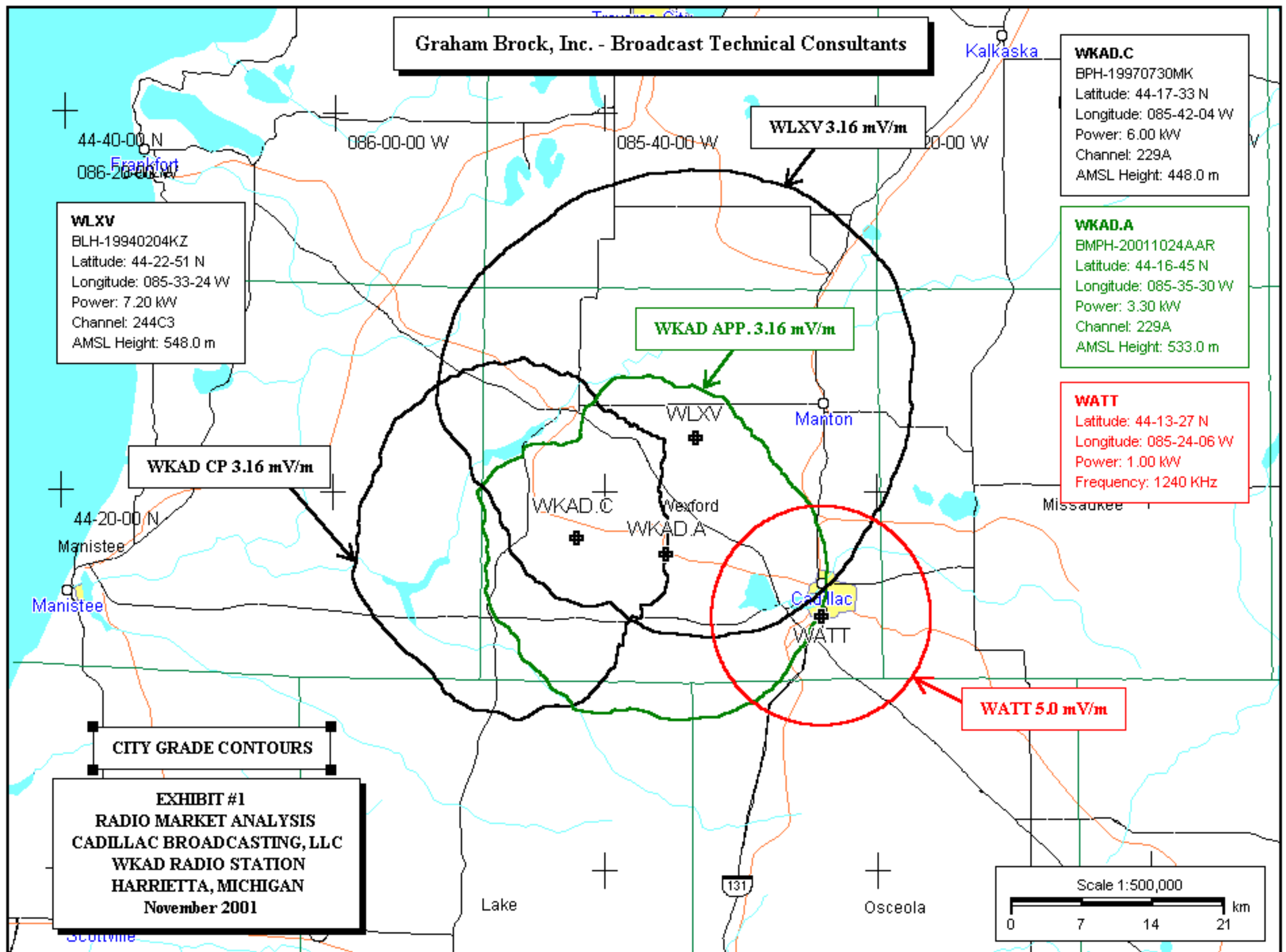
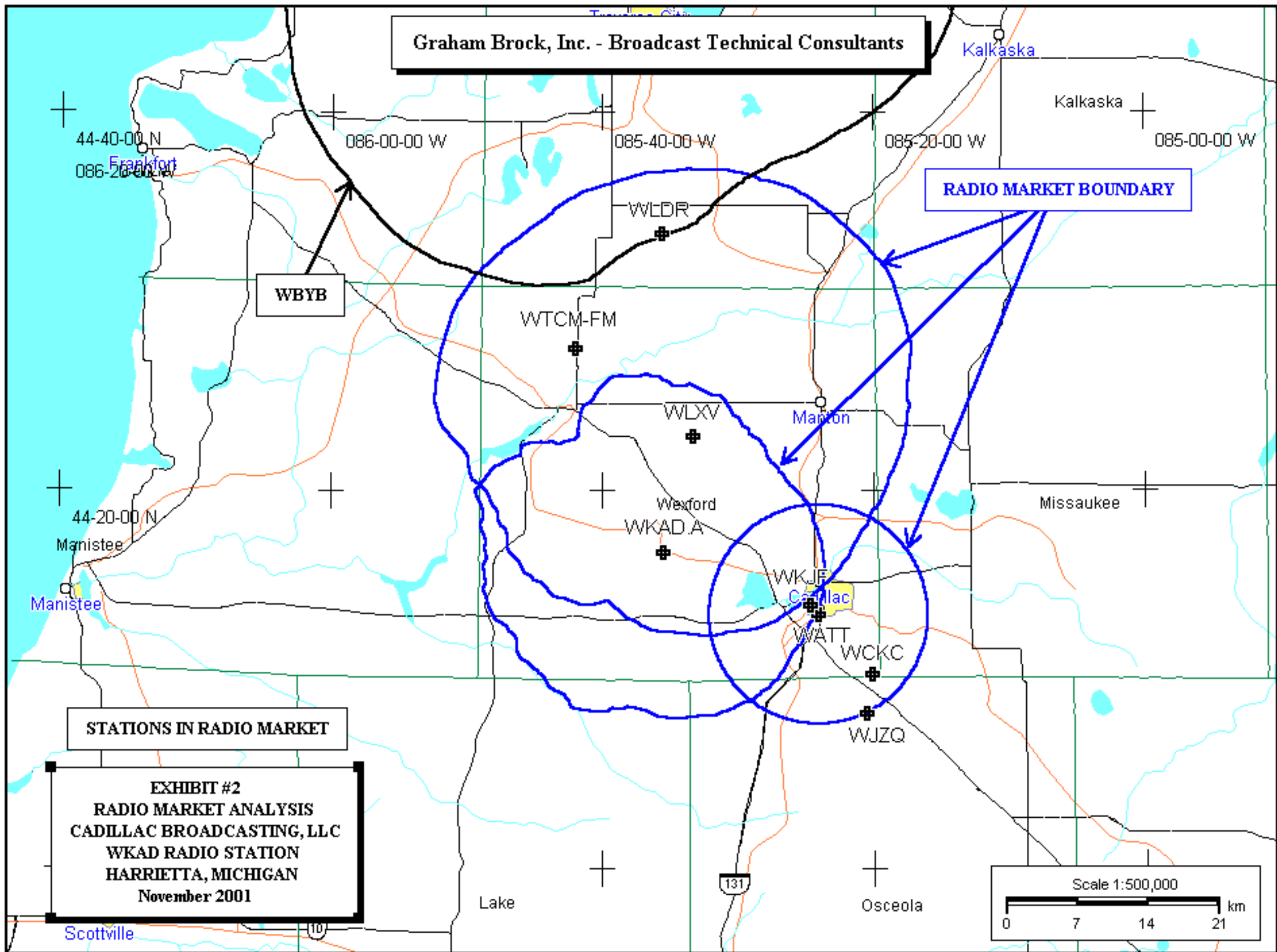


EXHIBIT #1  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

	WLDR	1210 kHz	Kingsley, MI
*	WATT	1240 kHz	Cadillac, MI
	WKJF	1370 kHz	Cadillac, MI

Total AM Stations - 3

**FM Stations**

	WJZQ	Ch 225C	Cadillac, MI
*	WKAD	Ch 229A	Harrietta, MI
+	WBYB	Ch 232C2	Leland, MI
*	WLXV	Ch 244C3	Cadillac, MI
	WTCM-FM	Ch 278C	Traverse City, MI
	WCKC	Ch 296A	Cadillac, MI

Total FM Stations - 6

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9**

- \* Subject station.
- + City grade contour provides service to Radio Market.